

FCC,

My name is Rich Davis a licensed Amateur Radio Operator W4NMH.

I feel that this proposed section ?. Also, software may be designed to only be modified by the grantee of certification or may be designed to permit third parties to enable New Functions or Frequency Bands.

Such trends will stifle experimentation for Amateur Radio Operating within the HAM Bands.

b. Devices With Software-Based Capabilities

18. The SDR rules were intended to allow manufacturers to obtain approval for changes to the RF operating parameters of a radio resulting from software changes without the need to physically re-label a device with a new FCC ID number in the field. For a device to be certified as an SDR, in addition to demonstrating that the device complies with the applicable technical requirements, the applicant must also demonstrate that the device contains security features to prevent the loading of software that would allow the radio to operate in violation of the Commission's rules. The applicant generally has the option of whether to declare a device an SDR. Once the grantee of a device that is classified as an SDR makes any hardware modifications that require approval, the rules do not permit any subsequent software changes absent the filing of an application to obtain a new FCC ID. This section speaks to me that there will be a lack of experimentation leeway. That would make it harder for Part 97 users to modify Part 15 devices to operate in the Amateur Radio Bands.

The FCC should go further to encourage Manufactures of such Devices to make it easier for a Licensee in PART 97 to Operate the Device within Part 97 assigned frequencies.

Please do not approve this Proposed Rule Making without allowing for Part 97 Modification and Compliance for Experimentation and Emergency Communications Implementations.

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